

May 14, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
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Seattle, WA 98101

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Office of Air, Waste & Toxics

**Subject: April/May 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the April/May 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from April 9, 2014, to May 14, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period with two wells extracting groundwater (EW-2 and EW-4). No high-alarms were received during the month.
- GSI staff conducted a site visit on April 15, 2015 to evaluate the recirculation trench and gather the information necessary to develop the Work Plan for installation of the iSOCs and Rehabilitate the Recirculation trench. During the Visit, they figured out that the biofouling is restricted to the infiltration trench and the wells function as designed. Therefore, improving the ability of the trench to accept water is expected to return the system to full operational capacity.
- The First Quarter 2015 monitoring data was validated, mapped and tabulated. Per a conversation with Jan regarding the reporting schedule, semi-annual reporting will be conducted. Therefore, no report will be prepared for the First Quarter 2015 monitoring event. A data package with the results is attached. Pertinent observations include:
 - No data was rejected through the data validation. Appropriate qualifiers were added to the data. A full data validation report will be included in the semi-annual monitoring report.
 - Groundwater flow direction and gradient remains similar to the previous quarter. Pumping at EW-2 and EW-4 and infiltration into the trench result in a low horizontal gradient area directly downgradient of the trench.
 - The spike in PCP concentration at MW-3 (720 ug/L) from 4th Quarter 2014, has returned to concentrations similar to previous recent events (19 ug/L).

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- PCP at MW-22 increased from 120 ug/L to 240 ug/L. This well is located directly upgradient of EW-1 on the operational facility. We believe the increase in concentration is directly attributable to the reduction in extraction rates in the recirculation system, especially from EW-1 and a reduction in extraction rates from EW-2. Once the system is back in full operation, we expect the concentrations to decrease. Concentrations in MW-28, located directly downgradient of EW-1 continued to be low (0.4J ug/L PCP).
- MW-23, also upgradient of the extraction wells, but downgradient of the infiltration trench also showed an increase in concentration from 200 ug/L PCP to 270 ug/L PCP. Similar to MW-22, we anticipate that once the recirculation system is fully operational, the concentration will return to its decreasing trend.
- MW-34, located directly downgradient of EW-4 showed a significant increase in concentration to 1,800 ug/L PCP. This is similar to a concentration detected in that well in 2008, prior to start-up of the system. Currently, EW-4 is pumping at a rate less than 1 gpm and is expected to increase to approximately 4-6 gpm with rehabilitation.
- PCP concentrations in the other wells remained within the ranges of recent sampling events; suggesting that the extent of impact from the system clogging has remained small and will recover quickly after the system is fully operational.
- PAHs were not detected in most locations, and where they were detected, acenaphthalene, naphthalene, and/or anthracene were present at low concentrations that are orders of magnitude below their respective proposed cleanup levels (from the CMS).
- EPA approved Baxter's request to postpone the June sampling event until after the recirculation system has been rehabilitated.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period; however, until the system is rehabilitated, it is expected that its performance will continue to be below optimum.
- Baxter will prepare a work plan (anticipated to submit by May 22) for installation of the iSOCs and rehabilitation of the recirculation system. With EPA's approval, the work is expected to be conducted in the July/August timeframe.
- Baxter will submit a request to reduce the monitoring program.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- A data package with the First Quarter data is attached.



CERTIFICATION

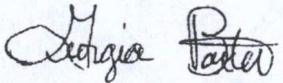
I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: April 8, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

